

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(Consolidated Cases)

**UNITED STATES' DESIGNATION OF
TESTIFYING GENERAL ELECTION EXPERTS**

Pursuant to this Court's June 8, 2022 Amended Scheduling Order, ECF No. 437, as amended by this Court's February 8, 2023 Order, ECF No. 518, the United States hereby files its designation of testifying general election experts.

1. **Dr. Eitan Hersh.** Dr. Hersh is a tenured professor of political science at Tufts University whose scholarly research focuses on U.S. elections and using individual-level data such as voter registration records to study politics. Dr. Hersh is expected to testify regarding the effects of SB 1 on acceptance and rejection of applications for ballots by mail and mail ballot carrier envelopes.
2. **Tammy Patrick.** Ms. Patrick is Chief Executive Officer for Programs of the Election Center (National Association of Election Administrators) and formerly a Senior Advisor at Democracy Fund, a Senior Fellow at the Bipartisan Policy Center, a Commissioner on the Presidential Commission on Election Administration, and the Federal Compliance Officer for the Maricopa County Elections Department. Ms. Patrick is expected to testify regarding the consistency of SB 1's vote-by-mail identification document number requirements with sound election administration practices and principles.

Also pursuant to this Court's June 8, 2022 Amended Scheduling Order, the United States has on this day served on all parties, but not filed, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B).

Date: February 10, 2023

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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Michael E. Stewart

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